1		STATE OF CALIFORNIA					
2		DEPARTMENT OF PUBLIC HEALTH					
3							
4	IN RE:	Caltrans, Cactus City Rest Area					
5		464 W. Fourth Street, MS 1108					
6		San Bernardino, CA 92401					
7							
8	то:	Cindy Mondary					
9		Drinking Water Manager					
10							
11	CITA	TION FOR NONCOMPLIANCE - WATER SYSTEM NO. 3301075					
12	CITATION NO. 05-20-14C-003						
13	Issued on May 1, 2014						
14							
15	Section 1166	650, Article 9, Chapter 4, Part 12, Division 104 of the California Health					
16	and Safety (Code (H & S Code), authorizes the issuance of a citation for failure to					
17	comply with the requirements of the California Safe Drinking Water Act, or any						
18	regulation, standard, permit or order issued thereunder.						
19							
20	VIOLATION						
21	The Californi	a Department of Public Health, Drinking Water Field Operations Branch					
22	(hereinafter I	Department), hereby issues a citation to the Caltrans, Cactus City Rest					
23	Area (herein	after Caltrans) (mailing address: 464 W. Fourth St. MS 1108, San					
24	Bernardino, 0	CA 92401) for the following violations:					
25							
26	1. H & S Cc	ode, Section 116555 (a); and California Code of Regulations (CCR), Title					
27	22, Section	on 64426.1 (b) (2): Specifically, Caltrans failed to comply with the Primary					

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23	fre	e١
24	Me	etr

Drinking Water Standard for total coliform bacteria during March 2014. A public water system is in violation of the Total Coliform Maximum Contaminant Level MCL) when, for a system that collects fewer than forty samples per month, more han one sample collected during any month is total coliform positive.

California Code of Regulations (CCR), Title 22, Chapter 15, Sections 64421 hrough 64423. Specifically, Caltrans failed to collect routine bacteriological samples from its distribution system during the weeks of March 17 and March 24 per its Department approved June 5, 2013 total coliform rule (TCR) monitoring plan. In accordance to the TCR monitoring plan Caltrans is required to take two samples on a weekly basis.

California Code of Regulations (CCR), Title 22, Chapter 15, Section 64654.8 (a) 1) (B). Specifically, Caltrans failed to analyze its bacteriological raw water quality ample using density analysis for the month of March 2014.

ccordance with Section 116650 of the H & S Code, the above violation is sified as non-continuing violation.

25

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27

CKGROUND

rans serves water to a transient population at the eastbound and westbound sides ne Cactus City Rest Area. The Cactus City Rest Area is located off of the I-10 way, east of Indio. The source of water is Colorado River surface water via Metropolitan Water District's aqueduct. Raw water gravity feeds a 2,500-gallon raw water storage tank on the westbound side. Raw water is pumped from the raw water storage tank to 500 gallon storage/pressure tanks on the eastbound and westbound sides. Raw water from each side's 500 gallon storage/pressure tank serves the

1	treatment plants and/or the irrigation and toilet systems. Each treatment plant
2	consists of a Rosedale 5.0 micron pre-filter and a 1.0 micron Giardia barrier bag filter
3	followed by a flow meter and a 500-gallon filtered water storage/contact tank. The
4	Rosedale bag filter treatment plant is defined as an alternative technology treatment
5	system per Section 64653, Title 22, CCR.
6	
7	Caltrans currently samples for bacteriological monitoring at the Cactus City Rest Area
8	in accordance to the Rest Area's June 5, 2013's approved TCR monitoring plan. The
9	Rest Area does not have designated lockable sampling stations installed so instead
10	Caltrans collects its routine samples for total coliform bacteria water quality monitoring
11	from buildings' drinking fountains and/or at hose bibs in the Rest Area.
12	*
13	PREVIOUS ENFORCEMENT ACTIONS
14	The following enforcement action was previously issued to this system for a similar
15	violation:
16	
17	October 30, 2013, the Department issued Caltrans a Citation for having more than
18	one sample total coliform positive during the month of September 2013 at the Cactus
19	City Rest Area.
20	
21	October 31, 2012, the Department issued Caltrans a notice of violation for failing to
22	monitor completely at the Cactus City Rest Area distribution system for the month of
23	September 2012.
24	
25	May 12, 1994, the Department issued Caltrans a Citation for having more than one
26	sample total coliform positive during the month of April 1994 at the Cactus City Rest
27	Δτρο

1	CHRONOLOGY OF EVENTS
2	Friday, March 7, 2014: Five coliform samples were taken from the Cactus City Res
3	Area; two samples were taken from its Eastbound Rest Area, two samples from its
4	Westbound Rest Area and one sample from its raw water source.
5	
6	Sunday, March 9, 2014: At around 10:45 am the laboratory notified Caltrans that two
7	distribution system were positive for total coliform at the Cactus City Rest Area; one a
8	the Eastbound Rest Area and one at the Westbound Rest Area. Upon notification
9	Caltrans closed the Rest Area.
10	
11	Please note: At this point the Rest Area had more than one total coliform positive tes
12	result for the month and had therefore failed the monthly total coliform MCL.
13	
14	Monday, March 10, 2014: While having the Cactus City Rest Area closed, Caltrans
15	performed chlorine residual checks on all of its sampling points, flushed the system
16	and collected the mandatory repeat samples. Caltrans collected a total of six
17	distribution repeat samples; three repeat samples at the Eastbound Rest Area and
18	three repeat samples at the Westbound Rest Area. A raw water sample was also
19	collected and analyzed for presence/absence method.
20	
21	Wednesday, March 12, 2014: Caltrans informed the Department that all samples
22	taken on Monday March 10, 2014 were negative for total coliform presence and
23	provided a copy of the results requesting reopening of the Rest Area. The Departmen
24	reviewed the results and approved Caltrans request to reopen the Rest Area. A copy
25	of the laboratory test results is included in Attachment 1 .

26

27

1	Monday, March 17, 2014: Caltrans re-opened the Cactus City Rest Area.
2	
3	Please note: Because total coliform samples were taken March 10, 2014, a week
4	prior, Caltrans was required to take a sample during the week of March 17, 2014.
5	
6	Wednesday, March 19, 2014: The Cactus City Rest Area was closed due to an
7	aerator problem and its pond overflowing.
8	
9	Friday, March 21, 2014: Repairs were completed to the pond and the Cactus City
10	Rest Area was re-opened to the public. No further monitoring for total coliform was
11	performed at the distribution system for the rest of the month.
12	
13	Wednesday, April 2, 2014: Caltrans took routine coliform samples at its Cactus City
14	Rest Area and were all negative for total coliform presence.
15	
16	Wednesday, April 9, 2014: Caltrans took routine coliform samples at its Cactus City
17	Rest Area and were all negative for total coliform presence.
18	
19	Monday, April 14, 2014: Caltrans informed the Department that the Cactus City Rest
20	Area will be closed and remain closed for approximately seven months due to repairs.
21	
22	DISCUSSION OF CONTRIBUTING PROBLEMS, SANITARY HAZARDS AND
23	PUBLIC HEALTH SAFEGUARDS
24	
25	As a surface water system the Caltrans Cactus City Rest Area is required to provide a
26	3-log removal/inactivation of Giardia lamblia cysts and 4-log removal/inactivation of
77	enteric viruses through filtering and chlorine disinfection. Because enteric viruses are

generally more resistant to chlorine disinfection than enteric bacteria, a 4-log inactivation of viruses indicates a more than 4-log inactivation of bacteria. Through its treatment facility Caltrans Cactus City meets the above mentioned requirements when providing treated water that is below a turbidity of 0.2 NTU and a minimum chlorine residual of 1.0 ppm at its treatment plant effluent. To ensure that the above requirements are met at all times Caltrans has a solenoid valve installed at both treatment plant effluents that is interconnected to its Hach Accu4 or Hach 1720D turbidimeters and Hach CL 17chlorine residual analyzers. The solenoid valve will shut down the effluent prior to distribution whenever the turbidity and chlorine residual requirements are not met. In addition Caltrans maintains and calibrates its turbidimeters, tests its chlorine residual analyzers for reliability, and has its filters and pre-filters changed on a monthly basis. According to its surface water treatment report the last time Caltrans had its pre-filters and filters changed, and had its turbidmeters and analyzers checked and tested for reliability, before the total coliform incident, was on March 7, 2014.

From the Department's review of Caltrans Cactus City Rest Area lab reports and discussion with the water system it was determined that Caltrans acted quickly and responsibly to ensure that the public was not exposed to a health treat after being notified of the two positive coliform results in its distribution system. The possible factors contributing to the two positive coliform samples may have been due to contaminated sampling taps and/or improper sampling techniques. Caltrans shall ensure that sample taps are maintained and shall review sampler training and ensure proper sampling techniques are employed to minimize the possibility for contamination of water samples.

1	Also, the Department understands that the Rest Area's samples are collected and
2	analyzed by a laboratory under contract with Caltrans and that there was some
3	miscommunication between Caltrans and its contractor regarding the status of the
4	Rest Area during the month of March 2014. Yet, Caltrans is reminded that it is
5	Caltrans responsibility to ensure that samples are collected and analyzed during each
6	monitoring period.
7	
8	DIRECTIVES
9	Caltrans is hereby directed to take the following actions:
10	
11	1. Forthwith, Caltrans shall cease and desist from failing to comply with the Primary
12	Drinking Water Standard for bacteriological water quality.
13	
14	2. Caltrans shall cease and desist from failing to analyze the Cactus City Rest Area's
15	bacteriological raw water quality samples using density analysis at its surface
16 17	water source as required in Section 64654.8 (a) (1) (B), Title 22, CCR.
18	3. Caltrans shall cease and desist from failing to collect routine bacteriological
19	samples from its distribution system are required in Sections 64421 through
20 21	64423, Title 22, CCR.
22	4. Caltrans shall review its communication procedures with its contractors to ensure
23	that bacteriological water quality samples are taken on a weekly basis and/or as
24	required in Caltrans TCR monitoring plan.
25	
26	5. Caltrans shall review its water sampler training to ensure that proper sampling
27	techniques are followed to minimize the possibility for contamination of water

28

samples.

1	All submittals required by this Citation shall be sent to:
2	
3	J. Steven Williams, P.E.
4	District Engineer
5	Department of Public Health
6	Division of Drinking Water and Environmental Management
7	1350 Front Street, Room 2050
8	San Diego, CA 92101
9	
10	CIVIL PENALTY
11	Failure to comply with any provision of this citation may result in the Department
12	imposing an administrative penalty of not less than \$200.00 (Two hundred dollars) per
13	day as of the date of violation of any provision of this citation.
14	
15	5-1-2014 J. Harris
16	Date J. Steven Williams, P.E.
17	District Engineer
18	Riverside District
19	Drinking Water Field Operations Branch
20	
21	
22	cc: County of Riverside, Department of Environmental Health
23	
24	Attachments: 1. March 2014 total coliform laboratory results
25	
26	
<u> </u>	

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State of California -- Health and Human Services Agency

Department of Public Health Drinking Water Program

MONTHLY SUMMARY OF DISTRIBUTION SYSTEM COLIFORM MONITORING (including triggered source monitoring for systems subject to the Groundwater Rule)

System Name			System Nur	iber .		
	CACTUS CITY SRRA			3301075		
Sampling Period Mooth	March		Year		2014	
		Number Required		Number Collected	Number Total Coliform Positives	Number Fecal/ E.coli Positives
1. Routine Samples	(see note 1)	8		4	2	0
	following Samples that are Total Coliform al/E.coli Negative (see notes 5 and 6)			7	1	1
Total Coliform Per (see notes 5 and	142/1	416	()A	0	0	0
4. MCL Computation	on for Total Coliform Positive Samples					
a. Totals (sum o	f columns)			11	3	
percent of san	samples collected in month, determine nples that are total coliform positive r positive/total number collected) x 100 =		%		Closed or	13-9-14
c. Is system in co	ompliance with fecal/E. coli MCL? (see notes 2 and 3)	☐ Yes	•	☑ No	Keopen 3	-21-14
	with monthly MCL? (see note 4)	☐ Yes		☑ No		
	Triggered by Routine Samples that are Total Colife by to systems subject to the Groundwater Rule - se		8)			
	ples, if any, were invalidated; who authorized the i Attach additional sheets, if necessary.)	nvalidation; ar	nd when	replaceme	nt samples	
	eteu by.					
Brench	D. Anlesson	Title		CALTRAN	NS SUPERVISOR	143-14
NOTES AND INSTRUCTION Koutine samples include		g Water M	gr.			

- a Samples required pursuant to 22 CCR Section 64423 and any additional samples required by an approved routine sample siting plan established pursuant to 22 CCR Section 64423
- b. Extra samples are required for systems collecting less than five routine samples per month that had one or more total coliform positives in previous month;
- e Extra samples for systems with high source water turbidities that are using surface water or groundwater under direct influence of surface water and do not practice filtration in compliance with regulations;
- 2 Note: For a repeat sample following a total coliform positive sample, any fecal/E.coli positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the Department (22, CCR, Section 64426.1)
- 3. Note: For repeat sample following a fecal/E.coli positive sample, any total coliform positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the Department (22, CCR, Section 64426.1)
- 4 Total coliform MCL (Notify Department within 24 hours of MCL violation):
 a For systems collecting less than 40 samples, if two or more samples are total coliform positive, then the MCL is violated.
 - b. For systems collecting 40 or more samples, if more than 5.0 percent of samples collected are total coliform positive, then the MCL is violated
- 5 Positive results and their associated repeat samples are to be tracked on the Coliforn Monitoring Worksheet
- 6. Repeat samples must be collected within 24 hours of being notified of the positive results. For systems collecting more than one routine sample per month, three repeat samples must be collected for each total coliform positive sample. For systems collecting one or fewer routine samples per month, four repeat samples must be collected for each total coliform positive sample
- 7 For systems subject to the Groundwater Rule: Positive results and the associated triggered source samples are to be tracked on the Coliform Monitoring Worksheet.
- 8 For triggered sample(s) required as a result of a total coliform routine positive sample, an E.coli, enterococci, or coliphage positive triggered sample (boxed entry) requires immediate notification to the Department, Tier 1 public notification, and corrective action. 10/2009 - 8477

COLIFORM MONITORING WORKSHEET CACTUS CITY

Page _

(COMPLETED FOR POSITIVE ROUTINE SAMPLES, ALL REPEAT SAMPLES, AND ALL TRIGGERED SOURCE SAMPLES) Report Month MARCH Year 2014

Routine Samples 9				Repeat S	ample	es ⁶	Triggered Source Samples 8				
TC+ TC+ 2		Repeat	Repeat Sample Site	Coliform Results (Check one box)			Source				
Sample Date	Site ID	Results	Collection Date	IDs ¹⁰	TC-	TC+BUT FC/EC-	TC+AND FC/EC+	Source Sample Date	Groundwater Source(s) Sampled	¹² TC Results	11,12 E. col Results
			11-Mar	1 PET FAUCET	NEG			3/11/2014	WELL	NEG	(+/-)
9		(+/-)POSITIV		D/F RIGHT	NEG					(+/-)	(+/-)
		É		3 D/F LEFT	NEG					(+1-)	(+1-)
3/8/2014	PET FAUCET			4 D/F RIGHT	NEG					(+/-)	(+1-)
			3/11/2014	1 D/F	NEG			2		(+/-)	(+/-)
		(+/-)POSITIV		D/F	NEG			3/11/2014	WELL	NEG	(+1-)
		E		3						(+1-)	(+/-)
3/8/2014	D/F			4						(+/-)	(+/-)
				1						(+/-)	(+/-)
	1	(+/-)		2						(+1-)	(+1-)
				3						(+/-)	(+1-)
				4						(+1-)	(+/-)
				1						(+/-)	(+/-)
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				4						(+1-)	(+1-)
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Clinical Laboratory of San Bernardino, Inc.



Cal Trans RC SRRA Project: Cactus City #744 RC SRRA Work Order: 14C0659 464 West 4th Street, 6th Floor, MS 1108 Sub Project: System Number 3301075 Received: 03/08/14 09:45 San Bernardino CA, 92401 Project Manager: Cindy Gano Reported: 03/10/14 East Pet Faucet 14C0659-01 (Water) Sample Date: 03/07/14 19:30 Sampler: Paul Harding Analyte Prepared Analyzed Batch Method Result Units Rep. Limit **Oualifier** Microbiology Analyses Total Coliform P SM 9223 P/A 03/08/14 03/09/14 1411019 Note E. Coli SM 9223 A P/A 03/08/14 03/09/14 1411019 Left Drinking F 14C0659-02 (Water) Sample Date: 03/07/14 19:35 Sampler: Paul Harding Analyte Prepared Analyzed Method Rep. Limit Batch Qualifier Result Units **Microbiology Analyses** Total Coliform SM 9223 03/08/14 A P/A 03/09/14 1411019 SM 9223 E. Coli 03/08/14 03/09/14 A P/A 1411019 **West Pet Faucet** 14C0659-03 (Water) 03/07/14 20:15 Sample Date: Sampler: Paul Harding Analyte Prepared Analyzed Batch Method Result Rep. Limit Qualifier Units Microbiology Analyses Total Coliform SM 9223 Α P/A 03/08/14 03/09/14 1411019 E. Coli SM 9223 03/08/14 03/09/14 1411019 P/A West Right Drinking F 14C0659-04 (Water) Sample Date: 03/07/14 20:25 Sampler: Paul Harding Analyte Prepared Analyzed Batch Method Result Units Rep. Limit Qualifier Microbiology Analyses **Total Coliform** SM 9223 P P/A 03/08/14 03/09/14 1411019 Note E. Coli SM 9223 A P/A 03/08/14 03/09/14 1411019 West Bound Raw Water 14C0659-05 (Water) 03/07/14 20:30 Sample Date: Sampler: Paul Harding Analyte Prepared Analyzed Batch Method Result Units Rep. Limit Qualifier Microbiology Analyses Total Coliform SM 9223 Α P/A 03/08/14 03/09/14 1411019 E. Coli SM 9223 03/08/14 P/A 03/09/14 1411019 Α **Plate Count** SM9215B 14 CFU/ml 1 03/08/14 03/10/14 1411021 HT-08 Notified Brenda Anderson 3/9/14, 1045 Note

Analysis performed outside of recommended 8 hour hold time but within required 24 hour hold time.

Analyte NOT DETECTED at or above the reporting limit

HT-08

ND

Clinical Laboratory of San Bernardino, Inc.

Cal Trans RC SRRA

Microbiology Analyses
Total Coliform

E. Coli



Work Order: 14C0859

Received: 03/11/14 13:57 Sub Project: System Number 3301075 464 West 4th Street, 6th Floor, MS 1108 Reported: 03/14/14 Project Manager: Brenda D. Anderson San Bernardino CA, 92401 Sample Date: 03/10/14 23:00 East RA Pet Faucet Grab 14C0859-01 (Water) Sampler: Paul Harding Prepared Analyzed Batch Qualifier Analyte Method Result Units Rep. Limit Field Analyses Cl Res Free (Field) Field 1.9 mg/L 03/10/14 03/10/14 1411170 Microbiology Analyses Total Coliform SM 9223 Α P/A 03/11/14 03/12/14 1411205 03/11/14 03/12/14 1411205 E. Coli SM 9223 Α P/A 03/10/14 23:00 Sampler: Paul Harding 14C0859-02 (Water) Sample Date: East RA Drinking Fountain Right Prepared Analyzed Batch Qualifier Method Result Units Rep. Limit Field Analyses 03/10/14 1411170 03/10/14 Cl Res Free (Field) Field 1.89 mg/L Microbiology Analyses 03/11/14 03/12/14 P/A 1411205 Total Coliform SM 9223 Α 03/11/14 03/12/14 SM 9223 P/A 1411205 E. Coli 03/10/14 23:00 Sampler: Paul Harding 14C0859-03 (Water) Sample Date: East RA Drinking Fountain Left Analyzed Prepared Batch Qualifier Analyte Method Result Units Rep. Limit Field Analyses 03/10/14 03/10/14 1411170 Cl Res Free (Field) Field 1.89 mg/L

Project: Cactus City #744 RC SRRA

West RA Pet Faucet Grab		14C0859-	-04 (Water)	Sample Date:	03/10/14 23	:15 Samp	pler: Paul Harding	
Analyte	Method	Result	Units	Rep. Limit	Prepared	Analyzed	Batch	Qualifier	
Field Analyses									
Cl Res Free (Field)	Field	1.77	mg/L		03/10/14	03/10/14	1411170		
Microbiology Analyses									
Total Coliform	SM 9223	A	P/A		03/11/14	03/12/14	1411205		
E. Coli	SM 9223	Α	P/A		03/11/14	03/12/14	1411205		
West RA Drinking Fountain Right		14C0859-	-05 (Water)	Sample Date:	03/10/14 23	:15 Sam	pler: Paul Harding	

P/A

P/A

03/11/14

03/11/14

03/12/14

03/12/14

1411205

1411205

SM 9223

SM 9223

Α

Analyte	Method	Result	Units	Rep. Limit	Prepared	Analyzed	Batch	Qualifier
Field Analyses		-						
Cl Res Free (Field)	Field	1.75	mg/L		03/10/14	03/10/14	1411170	
Microbiology Analyses								

Clinical Laboratory of San Bernardino, Inc.



	Cal Trans RC SRRA 464 West 4th Street, 6th Floor, MS 1108 San Bernardino CA, 92401	Project: Cactus City #744 RC SRRA Sub Project: System Number 3301075 Project Manager: Brenda D. Anderson	Work Order: 14C0859 Received: 03/11/14 13:57 Reported: 03/14/14
--	------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------

San Bernardino CA, 92401	Project Manager: Brenda D. Anderson						Rej	Reported: 03/14/14	
West RA Drinking Fountain Right		14C0859	-05 (Water	•)-	Sample Date:	03/10/14 23	:15 Sam	pler: Paul Harding	
Analyte	Method	Result	Units	Rep. Limit	Prepared	Analyzed	Batch	Qualifier	
Microbiology Analyses									
Total Coliform	SM 9223	Α	P/A		03/11/14	03/12/14	1411205		
E. Coli	SM 9223	Α	P/A		03/11/14	03/12/14	1411205		
West RA Drinking Fountain Left	14C0859-06 (Water)		•) !	Sample Date:	03/10/14 23	:15 Sam	pler: Paul Harding		
Analyte	Method	Result	Units	Rep. Limit	Prepared	Analyzed	Batch	Qualifier	
Field Analyses									
Cl Res Free (Field)	Field	1.75	mg/L		03/10/14	03/10/14	1411170		
Microbiology Analyses									
Total Coliform	SM 9223	Α	P/A		03/11/14	03/12/14	1411205		
E. Coli	SM 9223	Α	P/A	G	03/11/14	03/12/14	1411205		
Raw Water at Pump House		14C0859	-07 (Water	·) !	Sample Date:	03/10/14 23	:30 Sam	pler: Paul Harding	
Analyte	Method	Result	Units	Rep. Limit	Prepared	Analyzed	Batch	Qualifier	
Field Analyses									
Cl Res Free (Field)	Field	0.01	mg/L		03/10/14	03/10/14	1411170		
Microbiology Analyses									
Total Coliform	SM 9223	P	P/A		03/11/14	03/12/14	1411205	Notea	
E. Coli	SM 9223	P	P/A		03/11/14	03/12/14	1411205	Notea	
Plate Count	SM9215B	590	CFU/ml	1	03/11/14	03/13/14	1411362	HT-08, Note	
Notified Brenda 3/12/14 0905									
Note Notified Brenda 03/13/14 1500									
IT-08 Analysis performed outside of rec	commended 8 h	our hold time	e but within	required 24 h	our hold time.				

ND Analyte NOT DETECTED at or above the reporting limit

Robin Glenney

Project Manager